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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

INTERNATIONAL MARKETS LIVE,
INC., a New York corporation dba
iMARKETSLIVE; CHRISTOPHER
TERRY, an individual;

Plaintiffs,

v.

JOEL SANTIAGO dba COPY PROFIT
SUCCESS GLOBAL; JOE OTIS dba
COPY PROFIT SUCCESS GLOBAL;
MUHAMMAD ZIDAN aka MACK
MILLS, an individual GREGORY
PERDRIEL, an individual; CARLOS
SANTIAGO, an individual; ROBBIE
ISSA, an individual;

Defendants.

Case No.: 2:18-cv-1112

COMPLAINT FOR:

- 1) DEFAMATION PER SE;
- 2) TRADE LIBEL;
- 3) TORTIOUS INTERFERENCE
WITH CONTRACTUAL
RELATIONS;
- 4) TORTIOUS INTERFERENCE
WITH PROSPECTIVE
ECONOMIC ADVANTAGE; and
- 5) CIVIL CONSPIRACY

COMES NOW, Plaintiffs by and through their attorneys, the Law Offices of P. Sterling Kerr, complain and allege against Defendants JOEL SANTIAGO and JOE OTIS dba COPY PROFIT SUCCESS GLOBAL (hereinafter collectively known as "CPSG"), Defendant dba COPY PROFIT SUCCESS GLOBAL, Defendant MUHAMMAD ZIDAN aka MACK MILLS (hereinafter "Mills"), GREGORY PERDRIEL (hereinafter "Perdriel"), CARLOS SANTIAGO (hereinafter "Santiago"), and ROBBIE ISSA (hereinafter "Issa") as follows:

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THE PARTIES

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2 1. Plaintiff INTERNATIONAL MARKETS LIVE dba iMARKETSLIVE (hereinafter
3 “IML”) is, and at all times relevant herein was, a New York corporation.

4 2. Plaintiff CHRISTOPHER TERRY (hereinafter “Terry”) is an individual and is, and at
5 all times relevant, a Nevada resident.

6 3. Defendants JOEL SANTIAGO dba COPY PROFIT SUCCESS GLOBAL, is an
7 individual and, upon information and belief, a Wisconsin resident.

8 4. Defendants JOE OTIS dba COPY PROFIT SUCCESS GLOBAL is an individual and,
9 upon information and belief, a Georgia resident.

10 5. Defendant MUHAMMAD ZIDAN aka MACK MILLS is an individual and, upon
11 information and belief, a Florida resident.

12 6. GREGORY PERDRIEL is an individual and, upon information and belief, a Florida
13 resident.

14 7. CARLOS SANTIAGO is an individual and, upon information and belief, a Florida
15 resident.

16 8. ROBBIE ISSA is an individual and, upon information and belief, a New York resident.

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19 **JURISDICTION AND VENUE**

20 9. This Court has diversity subject matter jurisdiction of this action. The Court has
21 diversity jurisdiction under 28 U.S.C. § 1332 because no Plaintiffs and Defendants are
22 residents of the same state, and because the amount in controversy, exclusive of interest and
23 costs, exceeds seventy-five thousand dollars (\$75,000.00).

24 10. Venue is proper as TERRY is a resident of the state of Nevada .
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GENERAL ALLEGATIONS

11. Plaintiff IML is a multi-level marketing organization that sells educational products regarding the trading of Foreign currencies.

12. Plaintiff Terry is the CEO of IML.

13. Defendants Joel Santiago and Joe Otis are the “founders” of CPSG.

14. Upon information and belief, CPSG is a multi-level marketing organization that is advertising on the internet that it will sell products regarding trading Foreign currencies in the future.

15. Employees of CPSG are posting defamatory statements on the internet about IML in an attempt to discredit and undermine IML and sell CPSG’s products.

16. The employees’ posts are made at the direction of CPGS.

17. The employees posting the defamatory statements on behalf of CPSG are Mills, Perdriel, Santiago, and Issa.

18. Mack Mills has a Facebook account at <https://www.facebook.com/returnofthemack2016> where he publishes defamatory and other tortious statements against Plaintiffs.

19. On May 21, 2018 at 5:50 pm, Mack Mills posted the following entry on Facebook, “CPS they’re grrreat!! www.SecureYourPosition.com #Grrr”

20. Mack Mills posted on Facebook, “How’s IML different from CPS? Ones illegal and one isn’t but allow me to elaborate on your stupid questions LIVE and then visit www.macksHUGElaunch.com.”

21. CPSG’s website lists Perdriel as an “online marketer” for CPSG.

22. Perdriel has a Facebook account at <https://www.facebook.com/kashiz.kingiv> where he publishes defamatory and other tortious statements against Plaintiffs.

1 34. On May 18, 2018, Issa posts to Facebook May 18, 2018, “Best therapy ever FUCK
2 IML SCAM Fuck Chris Terry and the hole he crawled out of. Yeah just like that. Cause I
3 can.”

4 35. On May 19, 2018, Issa posts to Facebook, “FUCK IML SCAM – I’m right here Chris
5 come and get me, cross recruit is bitch tradewithrobbie.com.”

6 36. On numerous occasions on these social media platforms, one Defendant will post
7 defamatory statements, and then one or more other Defendants will comment below on the
8 posts, reaffirming the statements and making other defamatory statements in the comments
9 section.
10

11 37. In addition to the foregoing, there are other tortious and harmful statements against
12 Plaintiffs published on websites controlled by the Defendants.

13 **FIRST CLAIM FOR RELIEF**
14 **(Defamation Per Se against Defendants)**

15 38. Plaintiffs incorporate by reference and reaffirm each and every allegation previously
16 asserted as if fully set forth herein.

17 39. The statements, as cited in the general allegations, tend to harm the reputation of the
18 Plaintiffs in the estimation of the community and deter third persons from associating or dealing
19 with Plaintiffs.
20

21 40. The statements, as cited in the general allegations, are false.

22 41. The statements, as cited in the general allegations, were intentionally published on the
23 internet.

24 42. The statements, as cited in the general allegations constitute the imputation that
25 Plaintiffs have committed a crime; and/or Plaintiffs lack of fitness for trade, business, or
26 profession.
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1 43. As a direct and proximate result of Defendants' defamatory acts, Plaintiffs has been
2 harmed in amount in excess of one million dollars (\$1,000,000.00).

3 44. It has been necessary for Plaintiffs to retain the services of an attorney to prosecute this
4 action and, therefore, Plaintiffs are entitled to reasonable attorney's fees and costs, prejudgment
5 interest, and such other and further relief the court deems proper resulting from this action.

6 **SECOND CLAIM FOR RELIEF**
7 **(Trade Libel against Defendants)**

8 45. Plaintiffs incorporate by reference and reaffirm each and every allegation previously
9 asserted as if fully set forth herein.

10 46. The statements, as cited in the general allegations, about the Plaintiffs were
11 published on the internet.

12 47. The statements, as cited in the general allegations, disparage the quality of IML's
13 trading services.

14 48. The statements, as cited in the general allegations, are false.

15 49. The statements, as cited in the general allegations, were intentionally published on the
16 internet.

17 50. As a direct and proximate result of Defendants' trade libel, Plaintiffs has been harmed
18 in amount in excess of one million dollars (\$1,000,000.00).

19 51. It has been necessary for Plaintiffs to retain the services of an attorney to prosecute this
20 action and, therefore, Plaintiffs are entitled to reasonable attorney's fees and costs, prejudgment
21 interest, and such other and further relief the court deems proper resulting from this action.

22 **THIRD CLAIM FOR RELIEF**
23 **(Tortious Interference with Contractual Relations**
24 **against Defendants)**

25 52. Plaintiffs incorporate by reference and reaffirm each and every allegation previously
26 asserted as if fully set forth herein.
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1 53. Plaintiff IML had contractual relationships with customers and individual
2 representatives who desired participate in receiving educational products for Forex markets.

3 54. Defendants knew of these relationships.

4 55. Defendants spread false information and affirmatively filed false complaints with
5 regulators with the intent of disrupting Plaintiffs's relationships with its customers.

6 56. Defendants' conduct was not legally justified.

7 57. As a direct and proximate result of Defendants' interference with IML's contractual
8 relationships, Plaintiffs has been harmed in amount in excess of one million dollars
9 (\$1,000,000.00).
10

11 58. It has been necessary for Plaintiffs to retain the services of an attorney to prosecute this
12 action and, therefore, Plaintiffs is entitled to reasonable attorney's fees and costs, prejudgment
13 interest, and such other and further relief the court deems proper resulting from this action.

14 **FOURTH CLAIM FOR RELIEF**
15 **(Tortious Interference with Prospective Economic Advantage**
16 **against Defendants)**

17 59. Plaintiffs incorporate by reference and reaffirm each and every allegation previously
18 asserted as if fully set forth herein.

19 60. Plaintiff IML had prospective contractual relationships with customers and
20 individual representatives who desired to participate in receiving educational products for Forex
21 markets.

22 61. Defendants knew of these prospective relationships.
23

24 62. Defendants spread false information and affirmatively filed false complaints with
25 regulators with the intent of preventing and inhibiting Plaintiffs relationships with the
26 prospective customers.
27

28 63. Defendants' conduct was not legally justified.

1 64. As a direct and proximate result of Defendants' interference with the prospective
2 customer relationships, Plaintiff has been harmed in amount in excess of one million dollars
3 (\$1,000,000.00).

4 65. It has been necessary for Plaintiffs to retain the services of an attorney to prosecute this
5 action and, therefore, Plaintiff is entitled to reasonable attorney's fees and costs, prejudgment
6 interest, and such other and further relief the court deems proper resulting from this action.

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8 **FIFTH CLAIM FOR RELIEF**
(Civil Conspiracy against Defendants)

9 66. Plaintiffs incorporates by reference and reaffirm each and every allegation previously
10 asserted as if fully set forth herein.

11 67. Defendants have taken concerted action in defaming Plaintiffs and committing
12 tortious interference with contractual relations and tortious interference with contractual
13 relations.
14

15 68. As a direct and proximate result of Defendants' civil conspiracy, Plaintiffs have been
16 harmed in amount in excess of one million dollars (\$1,000,000.00).

17 69. It has been necessary for Plaintiffs to retain the services of an attorney to prosecute
18 this action and, therefore, Plaintiffs are entitled to reasonable attorney's fees and costs,
19 prejudgment interest, and such other and further relief the court deems proper resulting from
20 this action.
21

22 **WHEREFORE, PLAINTIFFS PRAY FOR**
23 **THE FOLLOWING RELIEF AGAINST DEFENDANTS:**

24 1. For Damages in an amount greater than \$1,000,000.00 as a result of Defendants'
25 defamatory and tortious actions;

26 2. For injunctive relief to enjoin the Defendants from continuing to commit the defamatory
27 and tortious actions;
28

1 3. For an award of pre-judgment interest, as well as reasonable attorneys' fees as both
2 normal and special damages, and other costs; and

3 4. For such other and further relief that this Court deems just and proper.

4 Dated this 22th day of June, 2018

5 LAW OFFICES OF P. STERLING KERR

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7 */s/ George E. Robinson*

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